## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS BROWNSVILLE DIVISION

SAVE RGV,

Plaintiff,

v.

Civil Action No. 1:24-CV-00148

SPACE EXPLORATION TECHNOLOGIES CORP.,

Defendant,

## NOTICE OF CORRECTED DECLARATION OF KATY GROOM IN SUPPORT OF DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER OR PRELIMINARY INJUNCTION

Defendant Space Exploration Technologies Corp. ("SpaceX") by and through undersigned counsel hereby submits this Notice and certifies the following:

- 1. On October 11, 2024, SpaceX filed a Response in Opposition<sup>1</sup> (Doc. No. 8) (hereinafter, "Opposition") to Plaintiff Save RGV's Emergency Motion for a Temporary Restraining Order or Preliminary Injunction (Doc. No. 5).
- 2. In support of its Opposition, SpaceX submitted the Declaration of Katy Groom (Doc. No. 8-6) (hereinafter, "Groom Declaration").
- 3. The Groom Declaration contains six photos depicting SpaceX's launch site and the deluge system that are the subject of Plaintiff's Motion. *See* Groom Decl. ¶¶ 17, 20, 31.
- 4. Due to a file conversion error, the version of the Groom Declaration filed on October 11<sup>th</sup> contains black-and-white versions of the photos in paragraphs 17, 20, and 31.

<sup>&</sup>lt;sup>1</sup> On October 15, 2024, SpaceX filed an Amended Response in Opposition brief to correct inadvertent typographical errors in the as-filed brief. *See* Doc. No. 14.

5. Attached to this Notice is an exact color copy of the Groom Declaration that was filed on October 11, 2024.

Dated: October 22, 2024 Respectfully submitted,

By: /s/ David L. Feinberg
David L. Feinberg, Attorney-In-Charge
DC Bar No. 982635
S.D. Tex. Bar No. 3882833
VENABLE LLP
600 Massachusetts Avenue NW
Washington, DC 20001
202.344.8278
202.344.8300
dlfeinberg@venable.com

Tyler Welti, pro hac vice California Bar No. 257993 VENABLE LLP 101 California Street, Suite 3800 San Francisco, CA 94111 415.653.3714 415.653.3755 (fax) tgwelti@venable.com

DAVID G. OLIVEIRA
State Bar No. 15254675
Federal ID No. 34165
ROERIG, OLIVEIRA & FISHER, LLP
10225 N. 10<sup>th</sup> Street
McAllen, Texas 78504
Telephone: (956) 393-6300
Facsimile: (956) 386-1625
doliveira@rofllp.com

Attorneys for Defendant Space Exploration Technologies Corp.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been filed via CM/ECF and is available for viewing and downloading electronically and has been served on all parties signed up for CM/ECF on October 22, 2024.

/s/ David L. Feinberg
David L. Feinberg